

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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CLERK'S OFFICE
U.S. DISTRICT COURT

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, *et*
al.,

Debtors

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**CLAIMANT LEONARD LAMM'S RESPONSE TO THE ONE HUNDRED AND
NINETY-EIGHTH OMNIBUS OBJECTION**

The Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), on behalf of the Commonwealth of Puerto Rico and the Puerto Rico Highways and Transportation Authority, filed its "One Hundred and Ninety-Eight Omnibus Objection" ("Objection") on June 11, 2020, seeking to disallow certain proofs of claim filed in this case. The Oversight Board alleges that the listed claims are duplicative of Master Claims brought by the Bank of New York Mellon. Claim number 48727, belonging to Claimant, Leonard Lamm¹ ("Mr. Lamm"), is listed as one of those duplicative claims. Mr. Lamm responds as follows:

"Exhibit A" to the Objection lists Mr. Lamm's claim number 48727, stating that "claimant asserts secondarily insured notes whose original CUSIP numbers are associated with one or more bonds issue by HTA that are duplicative of one or more Master Proofs of Claim...", but provides no confirming backup data.

¹ Leonard Lamm's contact information: 10401 Grosvenor Place #108, Rockville, MD 20852; counsel@jmelawpc.com; 202.364.4220

Mr. Lamm's claim lists two different bonds (see attached "Exhibit A"); however, the Oversight Board has failed to state which of the two bonds is duplicative or to provide proof, and seeks to disallow the entire claim. If Mr. Lamm's claim regarding a bond is duplicative, proof should be offered and only the bond that is duplicative should be disallowed, not the entire claim as the Oversight Board suggests.

The Oversight Board has failed to produce the original CUSIP numbers of the allegedly duplicative bonds. Without that information, Mr. Lamm cannot verify that his listed bonds are, in fact, duplicative and that he has already shown entitlement to relief pursuant to the New York Mellon Master Claim.

Wherefore, Claimant Leonard Lamm respectfully requests that this Court order the Oversight Board to produce the original CUSIP numbers of the listed duplicative bonds to Mr. Lamm, and if Mr. Lamm establishes that his claim for any bond is duplicative, he will withdraw it. He respectfully submits that it is patently unfair to disallow his claim as to any non-duplicative bond, and certainly it would be unfair to deny his entire claim 48727 in the absence of substantiation of the alleged duplication.

Respectfully submitted by:


Leonard Lamm

CERTIFICATE OF SERVICE

I hereby certify that the foregoing "Claimant Leonard Lamm's Response to the One Hundred and Ninety-Eighth Omnibus Objection" was served this 14th day of July, 2020 via first-class mail, postage prepaid, to the following recipients:

Clerk's Office

United States District Court

Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

Counsel for the Oversight Board


Proskauer Rose LLP

Eleven Times Square
New York, New York 10036-8299
Attn: Martin J. Bienenstock
Brian S. Rosen

Counsel for the Creditors' Committee

Paul Hastings LLP

200 Park Avenue
New York, New York 10166
Attn: Luc A. Despins
James Bliss
James Worthington
G. Alexander Bongartz



Leonard Lamm